U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Admin.
National Ocean Service
Coastal Protection and Restoration Division
c/o EPA Region 1; Mail Code HIO
1 Congress Street
Boston, MA 02114
7 September 2004

Ms. Christine Williams
U.S. EPA Office of Site Remediation and Restoration
J.F. Kennedy Federal Building
Boston, MA 02203

Mr. Fred Evans
U.S. Department of the Navy
Engineering Field Activity Northeast (EFANE)
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Dear Ms Williams/Mr. Evans:

Thank-you for the Phase II Screening Level Risk Assessment of IR Program Site 16, NCBC, Davisville, RI, dated August 2004. NOAA's interest at this site pertains to the marine/estuarine environment of Allen Harbor. We did not examine the risk calculations for the raccoon and herring gull. NOAA was pleasantly surprised to learn of the lower than expected sediment concentrations found in the lab-analyzed samples, particularly for total PAH. From our examination of the Risk Assessment Pilot Study (RAPS) and the RSC PAH results received earlier this year, we had expected greater PAH concentrations given the three potential sources – the Fire Fighting Training Area, the former creosote tanks used for dipping wood pilings, and the storm drain that connects to a large parking lot. NOAA agrees that the results of the benthic invertebrate risk assessment indicate a low potential effect. Nevertheless we have three comments.

1. Despite the Fixed Lab and RSC concentrations mostly falling between the confidence limits (Figures 4-1 to 4-4), NOAA was disappointed with the results of the RSC. We believe that the PAH concentrations approximately 250% greater than their actual (laboratory) concentration results in considerable doubt for future use. Similarly, the metal data, 35-41% under-predicting the metals are also too great. We urge further discussion and experimentation.

2. Section 4.3 compares sediment data from this study to that collected previously. I am unclear if the two stations from the RAPS are from Phase 1 (AH-7 and AH-8) or Phase 2 (AH-7 and SN). The text is unclear but I assume the high total PAH concentration of 150-200 mg/kg is from the SN sample that is in the vicinity of AH-49. NOAA

recommends that the Navy clarify the text and provide a better comparison of the samples collected during Phase 1 and Phase 2 of the RAPS with the current sampling results.

3. At least twice, the Navy states that the PAH concentrations are consistent with coastal areas of the United States. But they do not provide data supporting this assertion. It appears as a very defensive comment. More importantly, the sediment data shows concentrations that indicate a low potential for benthic community disruption. And the data points to several minor source areas apart from Site 16. These two results point to a very limited ecological risk.

Lastly, because sediment concentrations do exceed the ER-L, some may insist that the Navy move forward with a BERA. NOAA is ambivalent on this potential request. Rather, we believes that given the nature and extent of the PAH contamination and the mostly low metal concentrations and high AVS, the public would be better served if the Navy puts their environmental clean-up efforts elsewhere.

ACID VOLATILE SULFIDE

Sincerely,

Kenneth Finkelstein, Ph.D.